

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

**IN RE:**

**IRIS MICHELLE THOMPSON-EL  
Debtor.**

**CASE NO. 22-01238-KMS  
CHAPTER 13**

**MOTION FOR RELIEF FROM STAY**

**COMES NOW**, Consumer Portfolio Services, Inc., by and through undersigned counsel and moves this Court for the entry of an order granting it relief from the automatic stay and for grounds states as follows:

1. This Court has jurisdiction under 28 U.S.C. §1334 and 11 U.S.C. §362.
2. The Debtor filed the instant Chapter 13 bankruptcy case on June 29, 2022. The Debtor received Court approval to incur post-petition debt to purchase a vehicle on May 10, 2024. [Doc. No. 46]
3. On April 15, 2024, Iris Thompson El (“Debtor”) executed and delivered a Retail Installment Sale Contract (“Contract”) to Pine Belt Imports of Meridian, LLC, simultaneously assigned to Consumer Portfolio Services, Inc. (“Creditor”), for the purchase of a 2017 Ford Fusion, VIN: 3FA6P0HD2HR244666 (“Vehicle”). By entering into the Contract, the Debtor promised to make total payments of \$8,920.80 by remitting 24 consecutive monthly payments of \$345.45 beginning May 30, 2024.
4. A true and correct copy of the Contract and Certificate of Title evidencing the lien on the Vehicle is attached hereto as Exhibit “A.”
5. The Debtor has defaulted on the account by failing to remit direct payments pursuant to the terms of the Contract.

6. The account is due for the April 30, 2025, through June 30, 2025, payments in the total amount of \$1,036.35. The payoff on the account as of July 7, 2025 is \$4,297.38.

7. The Creditor requests this court waive the fourteen (14) day “stay” in accordance with Fed. R. Bankr. P. 4001(a)(4).

8. Should this Honorable Court deny the Creditor’s Motion for Relief from Automatic Stay, the Creditor would request that this Honorable Court direct that the stay shall be immediately lifted, without further order or notice, as to the Creditor in the event that the Debtor should default on any future payments.

9. The Creditor has had to incur additional expense in order to collect this post-petition debt in the form of attorney fees and costs and requests this Court award the Creditor reasonable Attorney’s fees and costs associated with this matter.

**WHEREFORE**, after notice and a hearing, Consumer Portfolio Services, Inc., requests the entry of an order granting it relief from the automatic stay.

Respectfully submitted this the 9<sup>th</sup> day of  
July 2025.

/s/ Kent D. McPhail  
Kent D. McPhail, MS Bar No. 2800  
Attorney for Creditor  
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**CERTIFICATE OF SERVICE**

I, Kent D. McPhail, do hereby certify that I have this 9th day of July 2025 served a copy of the above and foregoing Motion for Relief from Stay and Exhibit A to the following parties by the service method indicated:

**U.S. MAIL, FIRST CLASS POSTAGE PREPAID**

***Debtor***

Iris Michelle Thompson-EL  
101 Wedgewood Dr  
Fairfield AL 35064

**ECF FILING NOTIFICATION**

***Debtor's Attorney***

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**ECF FILING NOTIFICATION**

***Debtor's Attorney***

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**ECF FILING NOTIFICATION**

***Chapter 13 Trustee***

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**ECF FILING NOTIFICATION**

***United States Trustee***

501 East Court Street, Suite 6-430  
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/s/ Kent D. McPhail

Kent D. McPhail